Case: 4:20-cr-00096-HEA-SPM Doc. #: 4 Filed: 02/07/20 Page: 1 of 2 PageID #: 8

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

UNITED STATES OF AMERICA,)
Plaintiff,))
v.) No. 4:20 CR 96 HEA/SPM
LASHAWN CLAYBURN,)
Defendant.)

MOTION FOR PRETRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its Attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Angie E. Danis, Assistant United States Attorneys for said District, and moves the Court to order Defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of Defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, § 3141, et seq.

As and for its grounds, the United States of America states as follows:

- 1. Defendant is charged with armed carjacking, resulting in death, and discharge of a firearm in furtherance of a crime of violence, resulting in death, both of which carry maximum terms of imprisonment of life pursuant to Title 18, United States Code, Sections 2119(3) and 924(c) and (j). The defendant is not eligible for the death penalty in the present offense as he was 17 years of age as of January 5, 2019.
- 2. Accordingly, a rebuttable presumption arises pursuant to Title 18, United States Code, Section 3142(e)(3) that there are no conditions or combination of conditions which will reasonably assure the appearance of the defendant as required, and the safety of any other person and the community.

Case: 4:20-cr-00096-HEA-SPM Doc. #: 4 Filed: 02/07/20 Page: 2 of 2 PageID #: 9

3. The present offense involves the murder of a 61-year-old woman in the driveway of her

childhood home in Pine Lawn, Missouri. Within two hours of the homicide, the defendant can be

seen emerging from the victim's vehicle at Steak N' Shake, where he ordered a cheeseburger and

milkshakes with his friends.

4. In addition to the present charges, the defendant is also confined in the St. Louis City

Justice Center on charges of Murder in the Second Degree, Robbery in the First Degree,

Kidnapping, and Armed Criminal Action relative to the homicide of Chrishaun Hilliard on or about

January 17, 2019. This is pending under cause number 1922-CR00691-01.

WHEREFORE, the United States requests this Court to order Defendant detained prior to trial,

and further to order a detention hearing three (3) days from the date of Defendant's initial

appearance.

Respectfully submitted,

JEFFREY B. JENSEN United States Attorney

/s/ Angie E. Danis

ANGIE E. DANIS, #64805MO

Assistant United States Attorney

2